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ORIGINAL INTERVENTION

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AZ CORP COMMISSION
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BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
CHAIRMAN
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER

IN THE MATTER OF THE QWEST
CORPORATION TARIFF FILING TO INTRODUCE
A NEW RATE STRUCTURE FOR AN ACCESS
SERVICE USED BY INTEREXCHANGE
CARRIERS.

DOCKET NO. T-01051B-01-0391

**ELECTRIC LIGHTWAVE,
INC.'S MOTION TO
INTERVENE IN ACCORDANCE
WITH A.A.C. R-14-3-105**

Electric Lightwave, Inc. ("ELI") moves to intervene in the above-captioned
docket. ELI should be granted intervention for the reasons set forth below.

ELI is a competitive local exchange carrier with a Certificate of Convenience and
Necessity to provide competitive and facilities based telecommunications services within the
state of Arizona. ELI interconnects with Qwest and is both a customer and competitor of Qwest.
The proposed tariff at issue in this docket will apply to ELI. ELI is directly and substantially
affected by the outcome of this docket. ELI's participation in this docket will not unduly
broaden the issues presented. ELI is entitled to intervene pursuant to A.A.C. R14-3-105.


The name, address and telephone of the person upon whom service of all
documents should be made is:

Michael M. Grant, Esq.
Todd C. Wiley, Esq.
Gallagher & Kennedy, P.A.
2575 East Camelback Road
Phoenix, Arizona 85016-9225

1 For the reasons set forth above, ELI respectfully requests that the Commission
2 grant ELI's motion to intervene in this docket and reject the Qwest tariff filing.

3 DATED this 19 day of October, 2001.

4 GALLAGHER & KENNEDY, P.A.

5
6 By 
Michael M. Grant
Todd C. Wiley
2575 East Camelback Road
Phoenix, Arizona 85016-9225
Attorneys for Citizens Communications
9 Company

10 **Original** and ten copies filed this
11 19th day of October, 2001 with:

12 Docket Control
13 Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

14 **Copy** of the foregoing hand-delivered
15 this 19th day of October, 2001 to:

16 Steve M. Olea
17 Acting Director, Utilities Division
Arizona Corporation Commission
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18 Christopher C. Kempley, Esq.
19 Chief Counsel, Legal Division
Arizona Corporation Commission
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Phoenix, Arizona 85007

21 Lyn Farmer, Chief Administrative Law Judge
22 Hearing Division
Arizona Corporation Commission
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24

1 **Copy** of the foregoing mailed
this 9th day of October, 2001 to:

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